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March 4, 2014

**Via Facsimile**

Judge Shira A. Scheindlin  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1620  
New York, New York 10007

Re: Holly Shalom v. Hunter College of the City University of New York  
Docket No. 13-CV-4667 (SAS)

Dear Judge Scheindlin:

This Firm represents Plaintiff, Holly Shalom, in the above-referenced matter. We write, after consulting with Defendants' counsel, and with their consent, to request that Your Honor grant an extension of discovery in this matter so as to allow depositions to be complete. Presently, paper discovery has been completed and Plaintiff's deposition has been conducted. Plaintiff intends to conduct the deposition of the three individual defendants, as well as various other employees of Hunter, but, due to scheduling issues, it will be difficult to complete these depositions by March 14. Accordingly, it is respectfully requested that the Court grant a two week extension of time to complete these depositions (to March 28, 2014). Presently, the parties are scheduled to appear before Your Honor on March 28, so granting this extension would not push back any other dates or deadlines in this matter.

Thank you for your time and consideration of this request. This is Plaintiff's first request for the relief sought, and the second overall such request, as a joint request was previously made after settlement efforts failed.

Respectfully submitted,

WHITE RICOTTA & MARKS, P.C.

/s/

Thomas Ricotta

cc: Steven Banks, Esq. (via email)